

KELLER BENVENUTTI KIM LLP

Jane Kim (#298192)

(jkim@kbbkllp.com)

David A. Taylor (#247433)

(dtaylor@kbbkllp.com)

Thomas B. Rupp (#278041)

(trupp@kbbkllp.com)

650 California Street, Suite 1900

San Francisco, CA 94108

Tel: 415 496 6723

Fax: 650 636 9251

LITTLER MENDELSON P.C.

Elisa Nadeau (#199000)

(enadeau@littler.com)

50 West San Fernando Street, 7th Floor

San Jose, CA 95113

Tel: 408 961 7119

Fax: 408 516 8313

Attorneys for the Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Reorganized Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF JANE KIM IN
SUPPORT OF REORGANIZED DEBTORS'
OPPOSITION TO MOTION FOR RELIEF
FROM ORDER OF SPIRO JANNINGS**

Related to Docket Nos.: 11829 and 11871

Hearing Information:

Date: March 2, 2022

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 I, Jane Kim, pursuant to section 1746 of title 28 of the United States Code, hereby declare under
2 penalty of perjury that the following is true and correct to the best of my knowledge, information, and
3 belief:

4 1. I am a partner of Keller Benvenuti Kim LLP, counsel to PG&E Corporation (“**PG&E**
5 **Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors
6 (collectively, “**PG&E**” or the “**Reorganized Debtors**” in the above-captioned chapter 11 cases (the
7 “**Chapter 11 Cases**”). I submit this Declaration in support of the *Reorganized Debtors’ Opposition to*
8 *Motion for Relief from Order of Spiro Jannings* (the “**Opposition**”),¹ filed contemporaneously herewith.

9 2. Attached hereto as **Exhibit A** is a true and correct copy of the January 13, 2022 e-mail
10 exchange between Ankey Thomas, the Court’s judicial assistant, and Michael St. James, bankruptcy
11 counsel for Spiro Jannings, regarding the Reorganized Debtors’ Request for Order filed in connection
12 with the Claim Objection. As counsel for the Reorganized Debtors, I was copied on these e-mails.

13 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
14 correct to the best of my knowledge, information, and belief. Executed this sixteenth day of February,
15 2022, in Millbrae, California.

16 /s/ Jane Kim
17 Jane Kim

18
19
20
21
22
23
24
25
26
27
28 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in
the Opposition.